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DIST

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IGEG ROCKY FLATS

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June 9, 1993

93-RF-5535

R. J. Schassburger
Deputy Director
Environmental Restoration Division
DOE, RFO

STANDARD OPERATING PROCEDURE FO.23 - RLB-223-93

Attached is a draft letter for submittal to the Colorado Department of Health (CDH). Based on discussions during finalization of Standard Operating Procedure FO.23, the CDH requested an update on management of IDM generated at Operable Unit 1 (OU1) and Operable Unit 2 (OU2).

Existing data was evaluated for any detectable organics and for results above the upper colerance level for metals. These "exceedances" were then correlated to the corresponding drums to determine whether RCRA management is required. Base on these criteria the results were as follows:

- 220 drums not currently managed from AAC's have exceedences.
- 586 drums at OU1 and OU2 drill sites have no exceedences.
- 155 drums in RCRA Unit 18.03 have no exceedences.

247 OU1 and OU2 drums still do not have results associated with the IDM.

The 220 drums currently in AAC's will be moved to interim storage. The 155 drums in RCRA Unit 18.03 with no exceedences will be disposed of at the RFP landfill and the 586 drums with no exceedences currently at the well sites will either be dumped at the site or disposed of at the landfill.

CLASSIFICATION:

CORRES CONTROL
ADMIN RECORD
TRAFFIC

JONE VOI SECRET

AUTHORIZED CLASSIFIER SIGNATURE

DATE

IN REPLY TO RFP CC NO:

ACTION ITEM STATUS

J OPEN J CLOSED

J PARTIAL

TRAPPROVALS

MCB TWP

3F-46469 (Rev. 3/93)

R. J. Schassburger June 9, 1993 93-RF-5535 Page 2

A round table discussion of FO.23 was held on Friday June 4. Outstanding issues including drum labeling were discussed. If additional information is required, please contact Marla Broussard of my staff at extension 8517.

R. L Benedetti

Associate General Manager Environmental Restoration EG&G Rocky Flats, Inc.

MCB:la

Orig. and 1 cc - R. J. Schassburger

Attachment: As Stated

Attachment 1 93-RF-5535 Page 1 of 1

DRAFT

Colorado Department of Health Hazardous Materials and Waste Management Division

SUBJECT: MANAGEMENT OF INVESTIGATIVE DRILLING DRUMS HAS BEEN REEVALUATED

The reevaluation of investigative derived material (IDM) generated from the Operable Unit 1 (OU1 and Operable Unit (OU2) projects has been completed. Based on detectable levels (MDL) for organics, and detections above upper tolerance levels for metals, 155 of the 282 drums moved from Individual Hazardous Substance Sites (IHSSs) and Potential Areas of Concern (PACs) to RCRA Unit 18.03 contain no exceedances. It is planned that the contents, IDM, of these 155 drums will be disposed of at the Rocky Flats landfill. The empty drums and rigid liners will be repainted, restenciled, renumbered, and reused if possible. Drums and liners that are not in reusable condition will be cut up and sent off-site for recycling.

Initial characterization of analytical results for the OU1 and OU2 drilling projects also show 220 drums of IDM with exceedances are presently located at well sites. These drums will be moved to a RCRA Unit. The 220 drums are not from IHSSs, or PACs, but are from the recently identified additional areas of concern (AACs). An additional 247 drums of IDM are located in AACs and are without chemical analysis to date.

Five hundred and eighty-six additional drums of IDM located at drill sites have no exceedances. These drums will be either dumped at the drill sites or emptied at the landfill.

If you need additional information, please contact Rich Schassburger at 933-4888.

Department of Energy

DRAFT